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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
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14 SERVICE EMPLOYEES INTERNATIONAL )  
15 UNION, *et al.*, )

16 Plaintiffs, )

17 vs. )

18 SAL ROSSELLI, *et al.*, )

19 Defendants. )  
20

Case No. 09-CV-0404 WHA

**SUPERSEDEAS BOND POSTED BY  
DEFENDANT PHYLLIS WILLETT**

Hon. William H. Alsup

21 A judgment was entered in the above-captioned case in the United States District Court  
22 for the Northern District of California on April 12, 2010, against appellant Phyllis Willett in  
23 favor of appellee Service Employees International Union-United Healthcare Workers-West  
24 (UHW) in the amount of \$66,600.

25 Phyllis Willett has filed a timely notice of appeal of the judgment to the United States  
26 Court of Appeals for the Ninth Circuit and desires to suspend enforcement of the judgment  
27 pending determination of the appeal.  
28

1 Phyllis Willett undertakes and promises to pay to UHW all damages, costs, and interest  
2 that may be awarded to it following the appeal of this matter up to the sum of \$83,250 if

- 3 a. the judgment so appealed is affirmed;  
4 b. the appeal is dismissed; or,  
5 c. Phyllis Willett fails to promptly pay to UHW all sums awarded against her, in or  
6 following the appeal in this action, including any costs that the court of appeal may  
7 award if the judgment is modified.  
8

9 If Phyllis Willett fulfills the obligations on appeal set forth above, then this obligation  
10 will become void. Otherwise this obligation will remain in full force and effect.

11 Phyllis Willett hereby satisfies the requirement of Local Rule 65.1-1 of the United States  
12 District Court for the Northern District of California, and the Court's orders by:

13 (1) Depositing 50 percent (\$41,625) of the required bond in cash with the Clerk of  
14 the Court; and

15 (2) Pledging real property in California not exempt from execution, the value of  
16 which is more than sufficient to satisfy the remaining 50 percent of the bond.

17 Phyllis Willett declares as follows:

18 (1) The address of the property that I own that I am pledging as security for this  
19 bond to secure payment of the judgment is 1216 & 1216-1/2 Delaware Street, Berkeley,  
20 California 94702.

21 (2) I am the owner of said property and have the authority to pledge said property  
22 as security.

23 (3) The fair market value of the property is \$850,000.

24 (4) The outstanding balance of all loans secured by the property is \$11,342.

25 (5) The names and addresses of all lenders of all loans secured by said property is:  
26 GMAC Mortgage, P.O. Box 4622, Waterloo, Iowa 50704.

27 (6) All liens, charges, and other encumbrances on the property are: none.  
28

1 (7) I hereby promise not to alienate, encumber or impair the value of the property  
2 above the amount of \$600,000 until the bond is discharged without leave of Court.

3 (8) I hereby waive any homestead exemption pertaining to the property.

4 (9) I hereby promise to record this bond and the judgment against me with the  
5 Alameda County Recorder promptly upon its approval by the Court.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
7 October 4, 2010, at Emeryville, California.

8   
9 Phyllis Willett

10 Execution of judgment is hereby stayed as to defendant Phyllis Willett pending appeal.

11  
12 Dated: December 3, 2010.

